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PROGRESS REPORT NO. 140

TO: Monica Tonel, U.S. Environmental Protection Agency (EPA) – via Email
Kathryn Cerise, EPA – via Email

FROM: Kris McCaig, Teck American Incorporated (TAI)

Cc: Denise Mills, TAI – via Email

DATE: March 12, 2018

FILE NO: 01-773180-000

RE: Upper Columbia River (UCR) Remedial Investigation/Feasibility Study
(RI/FS) - Progress Report No. 140 Month Ending February 2018

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of activities completed during the past month in compliance with the aforementioned Agreement. It is also intended to provide a brief summary of pending and on-going activities.

Soil Amendment Technologies Evaluation Study (SATES) – Following the completion of Phase 1A field work in October, sample processing and analysis began and continued in the month of February. TAI continued coordination with the SATES team and Kira Lynch, Superfund Technology Liaison – Office of Research and Development office of Science and Policy during the month and began working on the draft data summary report (DAR) for the Phase 1 field study.

Benthic Macroinvertebrate Tissue Study – At the time of writing, TAI is in receipt of a letter from EPA dated March 2, 2018 providing approval for TAI to finalize the DSR. TAI will revised the small section of the DSR. TAI is in the process of finalizing the DSR for delivery to EPA and the document distribution list.

Plant Tissue Study – TAI submitted the draft quality assurance project plan (QAPP) to EPA and the Participating Parties on February 1, 2018 for review and comment. At the time of writing, TAI is in receipt of a letter dated March 1, 2018 with EPA's comments on the draft QAPP and is currently revising the QAPP in response to comments.

Delineation of Upland Soil Site – TAI is in receipt of a letter from EPA dated January 22, 2018 with an attached table of EPA's responses to the issues raised by TAI in its dispute of the level of effort for the background assessment. TAI continued to review and

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evaluate the letter and responses for use in revising the study data quality objectives and had a call with EPA on February 13 to plan for a technical meeting to discuss the topic of air dispersion modelling. At the time of writing an initial call was held on March 2, 2018 with the TAI and EPA project managers and air modelling technical team members and to discuss timing and agenda for a technical meeting on this topic. The meeting will take place on March 13, 2018.

Baseline Ecological Risk Assessment (BERA) - TAI is in receipt of a letter from EPA dated February 26, 2018 with specific final technical direction related to TAI's technical documents: Sediment Bioassay Data Evaluation Approach, dated October 12, 2017, Upper Columbia River Bioassay Data Analyses – Preliminary Results of the Concentration-Response Relationship Evaluation dated December 22, 2017, and Response to EPA's October 11, 2017, Memorandum on the use of Porewater Data, dated January 8, 2018. TAI is currently reviewing and evaluation the letter.

TAI received a letter from EPA dated January 8, 2018 (received via electronic mail January 9, 2018) notifying TAI that EPA is defining the upper reaches of the riverine portion of the UCR Site as a separable operable unit (OU). Attached to the letter was a Level of Effort (LOE) for Nature and Extent of Sediment Contamination in Upper Reach OU. TAI issued a Notice of Dispute letter to EPA on January 23, 2018 and K. McCaig and K. Cerise began the informal dispute resolution process. The informal dispute was resolved on February 20, 2018 and TAI is currently working DQOs for 2018 sediments study to include field sampling and analysis.

BERA Toxicity Reference Value (TRV) Development – TAI delivered an interim draft Wildlife TRV document to EPA on February 22, 2018 and continued work on the interim draft Fish Dietary TRV document during the month. At the time of writing, a meeting was held March 6, 2018 at which TAI, EPA and the Participating Parties discussed soil, sediment and porewater TRV development and chemicals of potential concern refinement for the BERA.

Draft Data Management Plan – TAI is in receipt of a letter dated February 16, 2018 with EPA's comments on the Draft 2010 Data Management Plan and received additional comments from EPA on February 28, 2018 via electronic mail. TAI is currently reviewing and evaluating the comments.

2010 White Sturgeon Sediment Toxicity Data Summary Report – At the time of writing, TAI is in receipt a letter from EPA dated March 1, 2018 with approval to finalize the November 2015 draft final DSR. EPA noted in the letter that it concluded that the water-only copper exposure data are usable for the BERA and Risk Assessment but that due to EPA's significant methodological and analytical concerns with the white sturgeon sediment toxicity tests, EPA concluded that these data are considered unusable for Upper Columbia River (UCR) Site. In follow up email correspondence from K. Cerise to K. McCaig, K. Cerise stated that the bulk sediment chemistry data from the study are considered useable for the BERA and Risk Assessment.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-623-4501.